



Water System Vulnerability Assessment Update

December 2003 Number 4



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WSVa Submission to EPA

Getting questions from Installations on how to submit the WSVa report to EPA? If you're the project officer for one of the approximately 40 Army Installations that must provide their secret WSVa report to the EPA, you may have already been asked about this. Here's some guidance for you and the Installation to use for submitting a secret WSVa report to EPA.

HQ IMA Guidance. The HQ IMA is requiring those Army Installations that must submit their WSVa report to EPA by the 30 June 2004 deadline to submit the report to their respective IMA Region Office by 31 May 2004. The IMA Region Offices have the responsibility to submit the WSVa reports to the EPA.

Submittal to the IMA Region Office. As a WSVa project officer, the Installation may ask your assistance in providing the WSVa report to the IMA Region Office. If so, a hardcopy of the report must be sent via registered mail or courier from security office to security office. Appropriate security classification markings must be present on the report pages and proper DA forms must be filled out. **Work closely with the security personnel to ensure the secret reports are properly transmitted to the designated IMA Region security office.** Currently, there is no guidance as to where at the IMA Region Offices to send the reports. Contact the respective IMA Region Office for guidance on where to send the report.

WSVa Certification Form. Once the WSVa is final the installation must submit a signed WSVa certification form to the EPA in addition to the WSVa report. A certification form can be downloaded from the following EPA website: www.epa.gov/safewater/security/util-inst-app1.pdf. An Installation representative responsible for the water system must sign this form. Because this form will be submitted to another Federal agency it is strongly recommended that the DPW Chief sign the form. This form should be considered unclassified and the signed original should accompany the secret WSVa report.

Submittal to EPA. Although it's the IMA Region Offices responsibility to submit the WSVa reports to the EPA it is helpful to understand the submittal process. The IMA Region Offices will submit the WSVa reports to a central POC at EPA Headquarters. The reports will not be going to the EPA Regional Offices. The IMA Region Offices must contact the phone number provided in EPA's *Addendum to the Instructions to Assist Community Water Systems in Complying with the Public Health Security and Bioterrorism Act, Oct 2003* (202-564-1355) (<http://www.epa.gov/safewater/security/util-inst-final-add.pdf>) to obtain an EPA security POC who will accept delivery of the WSVa reports. Additional information is found in EPA's *Instructions to Assist Community Water Systems in Complying with the Public Health Security and Bioterrorism Act* (<http://www.epa.gov/safewater/security/util-inst.pdf>)

EPA Actions to Safeguard WSVa Reports. The EPA will ensure that submitted WSVa reports are kept in a secure location and accessed only by designated persons under strict security procedures. And, as set forth in the Bioterrorism Act, submitted WSVa reports are exempt from disclosure under the Freedom of Information Act (FOIA). The EPA's *Protocol to Secure WSVAs submitted by CWS's to EPA, Nov 2002* (http://www.epa.gov/safewater/security/info_protect_11-30-02.pdf) provides more detailed information.

Installation Records. The Installation should maintain a copy of the secret WSVa report and a signed copy of the WSVa certification form. Additionally, the Installation should request HQ IMA provide a delivery receipt from the EPA. This receipt should be kept in Installation records for SDWA compliance purposes. The EPA is currently considering providing notification of WSVa report receipt via email or memorandum.

Contact WSMP. If you have any questions concerning the submittal of EPA-required WSVa reports, please give us a call. Mr. Steve Clarke is the USACHPPM WSVa project manager and has coordinated the submittal of the Fort Bragg and Fort George G. Meade WSVa reports to the EPA on behalf of HQ IMA. Contact Steve at COM 410-436-7746 or DSN 584-7746.

